

GRA

Keyana Porter

Plaintiff

United States District Court  
Northern District of Illinois

Superintendent for Chicago  
Public Schools, Janice K. Jackson  
SD 299  
Defendant

1:18-cv-06381  
Judge Edmond E. Chang  
Magistrate Judge Young B. Kim

COMPLAINT

See attached Complaint

**RECEIVED**

SEP 19 2018 *PS*

THOMAS G. BRUTON  
CLERK, U.S. DISTRICT COURT

### Complaint

Plaintiff was a special education student in Chicago Public Schools(CPS), GoodLow Elementary. She was sexually harassed and abused at the age of 8yrs. Old by an 11yr.old male student while riding the school bus from October 2007-June 2008. June 8,2008 The plaintiff reported to her mother that a male student engaged in inappropriate touching, using foul and explicit sexual language, rubbed his body on her, and forced kissing her on her mouth, some of which was witnessed by the bus driver who failed to report it. June 8,2008 Plaintiff's mother reported the complaint to school officials and the principle asking for a full investigation and again July 1, 2008 but, no investigation was done.

The female student was afraid to ride the bus, unable to attend after school tutoring and continued to be harassed in halls of school (one incident was witnessed by plaintiff's mother). Student's Parent was forced to provided transportation because male aggressor was allowed to continue to ride the bus. The degree of trauma the student suffered led to social-emotional issues, she exhibited and was diagnosed with oppositional defiant disorder by a qualified mental health professional.

Plaintiff's mother filed a complaint with the EOCO and OCR. Both agencies concluded that the school's principle acted with indifference. In 2009 the OCR outlined a Resolution Agreement to CPS district 299 requested by U.S Department of Education, OCR to comply with Title IX but the district failed to meet some of the obligations set forth in the agreement. In 2013 Parent was contacted by OCR when district failed to fully comply as district was instructed to mitigate damages the districts violation of Title IX may have caused to student.

In 2010 the EOCO concluded its investigation forwarded its finding to its law department for disciplinary action against the bus driver and the school's principle. The EOCO found that the principle, "failed to properly imitate an investigation" and that "by a preponderance of the evidence that the Board's policy and Title IX and sexual harassment policy was violated." The school's principle was later released from her position at GoodLow and the bus driver had already been released the bus company.2011 under "Unsafe school choice" parent transferred plaintiff.

The plaintiff went through trauma assessment and counseling as a result of the harassment. **Their future recommendations:** continued counseling services to address ODD (oppositional disorder), social-emotional issues, psychoeducational services to identify triggers, coping strategies for anxiety, fears and trauma.

Plaintiff prays that this court allow the plaintiff damages caused by Title IX violation by district 299. *Damages in the Amount of \$10,000<sup>00</sup>*

*Keypur Part 9/19/2018*